

**DECLARATION OF
PATRICK QUAID
ISO GOOGLE LLC'S
MOTION FOR
RELIEF RE
PRESERVATION**

**Redacted Version
of Document Sought
to be Sealed**

UNITED STATES DISTRICT COURT**NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

DECLARATION OF PATRICK QUAID

1. I am a Senior Software Engineer employed by Google LLC. I have been employed at Google as an engineer since September 2012. I have been the Technical Lead for [REDACTED] since 2014. In my capacity as Technical Lead, I am ultimately responsible for the design, performance and reliability of [REDACTED]. As part of my duties, I am personally aware of how [REDACTED] stores and organizes the data, and the tools available to search and filter the data. I also have access to metrics related to [REDACTED], including statistics related to the volume and size of the data stored. I make this declaration based on personal knowledge and information provided to me by Google colleagues, and if called to testify, I could and would competently testify to such facts.

2. I understand the Court issued preservation orders in the above-captioned case, requiring Google to preserve “all mapping and linking tables.”

3. The [REDACTED] team is preserving certain mapping/linking tables. Storing one snapshot of the tables will take approximately [REDACTED], and will grow at the rate of approximately [REDACTED] of storage per day.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 24th day of October 2022 at New York, New York.

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By: DocuSigned by:
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Patrick Quaid